

1 KAMALA D. HARRIS
Attorney General of California
2 PETER A. KRAUSE
Supervising Deputy Attorney General
3 ROSS C. MOODY
Deputy Attorney General
4 State Bar No. 142541
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 703-1376
6 Fax: (415) 703-1234
E-mail: Ross.Moody@doj.ca.gov
7 *Attorneys for Defendants California Department of
Justice and Attorney General Kamala D. Harris*

8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 **MARK AARON HAYNIE, BRENDAN
12 JOHN RICHARDS, THE CALGUNS
13 FOUNDATION, INC., and THE SECOND
AMENDMENT FOUNDATION, INC.,**

14 Plaintiffs,

15 v.

16 **KAMALA HARRIS, Attorney General of
California (in her official capacity) and
17 CALIFORNIA DEPARTMENT OF
JUSTICE, CITY OF ROHNERT PARK,
18 OFFICER DEAN BECKER (RP134), and
DOES 1 TO 20,**

19 Defendants.

20 **BRENDAN JOHN RICHARDS, THE
21 CALGUNS FOUNDATION, INC., and THE
SECOND AMENDMENT FOUNDATION,
INC. ,**

22 Plaintiffs,

23 v.

24 **KAMALA HARRIS, Attorney General of
California (in her official capacity),
25 CALIFORNIA DEPARTMENT OF
JUSTICE, SONOMA COUNTY
26 SHERIFF'S OFFICE, SHERIFF'S
DEPUTY GREG MYERS (SD1023) and
27 DOES 1 TO 20**

28 Defendants.

10-cv-1255-SI
11-cv-2493 SI
(Consolidated Cases)

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

11-cv-5580 SI
(Related Case)

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

**MAX JOSEPH PLOG-HOROWITZ, THE
CALGUNS FOUNDATION, INC., and THE
SECOND AMENDMENT FOUNDATION,
INC.,**

12-cv-00452 (LB)
(Related Case)

Plaintiffs,

v.

**KAMALA HARRIS, Attorney General of
California, CALIFORNIA DEPARTMENT
OF JUSTICE, COTATI POLICE
DEPARTMENT, CITY OF COTATI,
ANDREW LYSSAND (CO0339) and DOES
1 TO 20,**

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

Defendants.

IT IS HEREBY STIPULATED¹ by and between the parties hereto through their respective attorneys of record that the pending Case Management Conference currently set for June 29, 2012 in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California should be reset.

The Defendants in *Richards v. Harris I (Rohnert Park)*, Case No.: 3:11-CV-02493 SI have a motion to dismiss under submission that has been fully briefed and was argued on May 4, 2012. The parties believe that it would be a more productive use of the Court's time and resources to have the Case Management Conference after a ruling on the motion to dismiss has been issued

Accordingly, the parties propose that the Court reset the Case Management Conference to some date after the Court anticipates releasing its order from the May 4, 2012 hearing.

///

///

///

///

¹ *Haynie v. Harris*, Case No.: 3:10-CV-01255 SI was ordered consolidated with *Richards v. Harris*, Case No.: 3:11-CV-02493 SI, in an order filed on October 22, 2011. (See Documents # 42 and #15 respectively.) The second *Richards v. Harris*, Case No.: 3:11-CV-05580 was ordered to be related with the first two cases in an order filed on December 21, 2011. (See documents #47 and # 20 respectively.) The *Ploghorowitz v. Harris*, Case No.: 3:12-CV-0452 SI was ordered to be related on April 11, 2012. (See documents #32 and #20.)

SO STIPULATED.

Dated: June 20, 2012

/s/ Ross Moody

Ross Moody
Counsel for Defendants
Harris & California Dept. of Justice

Dated: June 20, 2012

/s/ Donald Kilmer

Donald Kilmer
Counsel for Plaintiffs

Dated: June 20, 2012

/s/ Robert W. Henkels

Robert W. Henkels
Counsel for Defendants
City of Rohnert Park & Becker
Counsel for Defendants
Cotati Police Department,
City of Cotati, & Lyssand

**ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND LOCAL
RULE VIII.B.**

I, Ross C. Moody, declare under penalty of perjury under the laws of California and the United States that I have in my possession e-mail correspondence from Donald Kilmer and Robert Henkels that the content of this document is acceptable to all persons required to sign the document. I declare that this document was signed in San Francisco, CA on June 20, 2012.

/s/ Ross Moody

Ross Moody
Deputy Attorney General
Attorney for Defendants
California Department of Justice and
Attorney General Kamala D. Harris

ORDER

The Case Management Conference in these consolidated and related matters currently set for June 29, 2012 is reset to: (Date) July 27, 2012, at (Time): 3 p.m., in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California –

1 San Francisco. A Joint Case Management Conference Statement shall be filed seven (7) calendar
2 days before the new date.

3 Date: 6/21/12

4 
5 United States District Judge

6
7
8
9 SA2010101060
10 20620461.doc
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28